

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Christopher Clay Pierce

Case: 2:24-mj-30474

Assigned To : Unassigned

Assign. Date : 11/1/2024

Case No.

Description: RE: SEALED MATTER
(EOB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 2, 2024, in the county of Jackson in the
Eastern District of Michigan, the defendant(s) violated:*Code Section*
18 U.S.C. § 875(c)*Offense Description*
Threats made in interstate communications.

This criminal complaint is based on these facts:

See attached affidavit.

☐ Continued on the attached sheet.Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: November 1, 2024City and state: Detroit, MI*Complainant's signature*Nathaniel Han, Special Agent*Printed name and title**Judge's signature*David R. Grand, United States Magistrate Judge*Printed name and title*

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Nathaniel Han, being duly sworn, depose and state the following:

1. I am employed by the Federal Bureau of Investigation as a Special Agent and have been since 2016. I currently work in the Ann Arbor Resident Agency of the Detroit Field Office. I have been involved in investigating child sexual exploitation and human trafficking crimes, foreign counterintelligence matters, organized crime, and violations of threatening communications.

2. This affidavit is made in support of an application for a criminal complaint and arrest warrant for **CHRISTOPHER CLAY PIERCE** (DOB XX/XX/1978) for violations of 18 U.S.C. § 875(c) (threats made in interstate communications).

3. I make this affidavit based upon personal knowledge and experience, conversations with and communications from others who have personal knowledge of the events and circumstances described herein, the knowledge and experience of other investigators and law enforcement personnel, and information acquired during the investigation. This affidavit is being submitted for the limited purpose of establishing probable cause, and I have set forth only those facts necessary to do so.

PROBABLE CAUSE

4. As set forth below, I have probable cause to believe that on or about October 2, 2024, PIERCE knowingly and willfully transmitted in interstate commerce two electronic communications containing threats to injure individuals associated with a political action committee (“PAC”). While PIERCE’s recent October 2, 2024 threats form the basis for the charges of the criminal complaint, PIERCE has a history of threatening behavior that further establishes his intent to have transmitted the charged threatening communications on October 2, 2024.

June 2022 Threat

5. On June 29, 2022, Instagram account “pierce_overhead_door” made the following statements online, in response to a witness’s testimony before the U.S. House of Representatives’ Select Committee to Investigate the January 6th Attack on the United States Capitol:

- a. “Not only is this career suicide, but where exactly in the world does she think she's gonna be able to hide from One of the worlds wealthiest men in his army? Because there's not a politician in this country that would come within 100 miles of this bitch now! You can't be trusted! And we all know what happens to snitches!”

b. “what comes next with make January 6th look like a Sunday stroll through the park! Democracy is dead! (if it ever existed) no presidential election some [sic] 2024!”

6. On September 28, 2022, FBI Agents interviewed PIERCE at his home at XXX Harris St, Jackson, MI, about the above statements on his Instagram account. PIERCE explained that the comment he made online, to the effect of, “There will be no 2024 election,” was meant to emphasize an on-going movement encouraging voters not to cast a vote at all. He stated that the federal government was “fake” and “illegitimate” anyway, which, he opined, was why the FBI was at his door to intimidate him.

7. An FBI Agent admonished PIERCE, stating that if PIERCE continued to make threatening statements online, PIERCE could be charged with a federal crime. PIERCE responded that the country will descend into civil war. PIERCE spoke through his door as agents were standing on the porch, and exhibited general hostility toward the agents during the interview.

October 2024 Threats

8. On October 2, 2024, PIERCE, identifying himself, in part, by the email address ccpierce6@gmail.com, sent two threatening web-based electronic communications to the PAC, which was engaged in permissible activities related to the November 5, 2024 election. PIERCE also identified the sender of the

communications by last name and first name as “Your worst fucking nightmare.”

The first electronic communication read:

“Every day, your people contact me with a campaign ad and it’s calling me racist. You motherfuckers contact me again [sic] I guarantee I can find each and every one of your fucking organizees. I’m a member of that American patriotfucking three bitch. And we will turn you motherfuckers inside out. I’ve already managed to locate one of your callcenters [sic].. you will shut this shit down or we will shut it down for you permanently. This year proves Kamala Harris is [sic] nothing but a fucking communist piece of fucking shit and doesn’t deserve to fucking even be in the race to become [sic] president. Now you better stop or I promise you this is badly for all of you motherfuckers and we won’t involve [sic] the law motherfucker..American patriot three are current and former US military and current and former law-enforcement [sic].”

The second electronic communication read:

You will shut down your entire organization or it will be shut down for you. 90% of the members of American patriot three are trained killers. Trained by uncle Sam. And they will go to work if you do not close up shop because [sic] obviously you cannot control the fucking retard that you allowed to use your platform. It paints targets on your [sic] backs and the backs of your families. Your call centers have been located. Don’t make these boys and girls go [sic] to work.”

9. On October 30, 2024, FBI Agents interviewed PIERCE at his home at XXX

Harris St, Jackson, MI, about the above threatening electronic communications.

PIERCE’s demeanor was generally hostile throughout the interview, and the

Agents spoke to PIERCE through his front screen door.

10. PIERCE acknowledged sending the electronic communications. The Agents read the communications out loud to PIERCE and asked PIERCE if he understood

how they could be perceived as threats by the recipients. PIERCE stated he did not see the emails as threatening.

11. PIERCE confirmed that ccpierce6@gmail.com, which PIERCE had identified in contact information for the sender on the web-based electronic communications platform, was his email address.

12. Agents admonished PIERCE for sending the communications and told PIERCE he should not send such threatening communications. PIERCE responded that he did not view the communications as threatening and that the PAC was harassing PIERCE.

13. PIERCE abruptly ended the conversation and aggressively closed his front door on the Agents.

14. The PAC contracts with another company that hosts the web-based electronic communications platform through which PIERCE transmitted the threatening communications. Because the company that hosts the platform is headquartered in and operates out of California, there is probable cause to conclude that PIERCE's threatening communications affected interstate commerce.

CONCLUSION

15. For the reasons set forth above, I believe probable cause exists that **CHRISTOPHER CLAY PIERCE** violated 18 U.S.C. § 875(c) (threats made in interstate communications).



Nathaniel Han
Special Agent
Federal Bureau of Investigation

Sworn to before me and signed in my presence
and/or by reliable electronic means.



HON. DAVID R. GRAND
UNITED STATES MAGISTRATE JUDGE

Dated: November 1, 2024